

**REMARKS/ARGUMENTS**

Upon entry of the above amendment, claims 12, 22, 26, and 28 will have been amended, and claims 12-15, 19-22, and 24-28 are pending and are submitted for reconsideration by the Examiner. In view of the above, Applicant respectfully requests reconsideration of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Initially, Applicant would like to express his appreciation to the Examiner for the detailed Official Action provided.

Turning to the merits of the action, the Examiner has objected to claims 26 and 28 as being dependent upon a rejected base claim. By the present amendment, Applicant has amended claims 26 and 28 into independent form including all of the limitations of the base claim and any intervening claims. Thus, Applicant respectfully requests that the Examiner withdraw the objection to claims 26 and 28.

The Examiner also has rejected claims 19-20 and 24 under 35 U.S.C § 102(e) as being anticipated by AKATSU et al. (U.S. Patent No. 6,496,862). The Examiner further has rejected claims 12-14, 22, 25, and 27 under 35 U.S.C § 103(a) as being unpatentable over AKATSU et al. (U.S. Patent 6,496,862) in view of LO et al. (U.S. Patent 6,324,178).

As noted above, Applicant has amended claims 12, 22, 26, and 28. Thus, claims 12-15, 19-22, and 24-28 remain pending. Applicant respectfully traverses the above rejection based on these amended and pending claims and will discuss the outstanding rejection with respect to the amended and pending claims in the present

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application as will be set forth hereinbelow. The amended claims merely clarify the subject matter recited in the rejected claims, but do not narrow the scope of the claims.

With respect to the rejection under 35 U.S.C § 102(e), Applicant's claims 19-21 relate to a gateway apparatus at a receiving side of a system that receives an Internet-frame including an IP address corresponding to a receiving apparatus that does not have an IP address and data from the transmitting apparatus. The gateway apparatus searches a memory for the receiving apparatus not having the IP address to which the data is to be transferred, based on the IP address included in the Internet-frame, and transfers the data to the receiving apparatus not having the IP address. Further, the gateway apparatus contains the memory which stores an IP address corresponding to the receiving apparatus not having the IP address and an application program. The application program converts received data into data which the receiving apparatus not having the IP address can interpret. Further, the controller converts the received data into data which the receiving apparatus not having the IP address can interpret, by utilizing the application program in the memory, when the received data is data which the receiving apparatus not having the IP address cannot interpret. The application program relates to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address. Claim 24 recites a related method.

On the contrary, AKATSU et al. teaches that the home gateway 504 is a managing node for maintaining the address mapping table (FIG. 13, col. 9, lines 7-19 and lines 54-64). FIG.13 illustrates an address mapping table 1600. However, the address mapping table 1600 contains node unique IDs, node IDs, IP addresses and so

on, but does not include an “application program being related to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address”. The address mapping table 1600 also contains common name 1608, but common name 1608 indicates a particular node (col. 14, lines 23-32). This is merely a user selected programmed name, but not an application program as defined herein. Thus, common name 1608 does not store “the application program being related to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address”. The address mapping table 1600 further contains program information 1636, but the program information indicates television programs such as CNN and HBO (Fig.13). Thus, the address mapping table 1600 does not disclose “the application program being related to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address”.

Further, AKATSU et al. merely discloses converting the external network format to the internal network format (col. 10, lines 16-25, lines 38-48, etc.). Thus, AKATSU et al. does not disclose “the application program being related to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address”.

Further, AKATSU et al. contains three other figures; the node icon table 2000 of Fig. 17, the node function table 2100 of Fig. 18, and the statistical data table 3000 of Fig. 27. However, none of these figures teach storing “the application program being

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related to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address”.

Thus, AKATSU et al. does not disclose storing “the application program being related to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address”. Therefore, inherently AKATSU et al. cannot convert “the received data into data which the receiving apparatus not having the IP address can interpret, *by utilizing the application program in the memory*, when the received data is data which the receiving apparatus not having the IP address cannot interpret”.

Therefore, it is respectfully submitted that the features recited in Applicant’s claims 19-21, and 24 are not disclosed in AKATSU et al. recited by the Examiner.

With respect to the rejection under 35 U.S.C. §103(a), Applicant’s claims 12-15 and 25 relate to a gateway apparatus at a transmitting side of a system which includes, inter alia, a controller that receives data from a transmitting apparatus that does not have an IP address, configures the data for Internet transmission, generates an Internet-frame based on the data received from the transmitting apparatus not having the IP address and based on an IP address which is assigned to a receiving apparatus. The IP address is input by an input device, and the transmitting apparatus not having the IP address does not have a capability of inputting the IP address. Further, the data received from the transmitting apparatus does not include a destination address of the receiving apparatus. Claims 22 and 27 recite related methods.

On the contrary, as the Examiner admitted in the outstanding Official Action mailed on May 6, 2004 and November 19, 2004, AKATSU et al. does not teach the

claimed controller which generates an Internet-frame based on the data received from the transmitting apparatus and an IP address assigned to a receiving apparatus, and which sends the Internet-frame to the receiving apparatus through the communicator.

Thus, AKATSU et al. does not disclose at least the claimed controller which generates an Internet-frame based on the data received from the transmitting apparatus not having the IP address and based on an IP address which is assigned to a receiving apparatus, and the claimed controller which sends the Internet-frame to the receiving apparatus through the communicator.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 12-15, 22, 25, and 27 are not disclosed in AKATSU et al. recited by the Examiner.

Regarding LO et al., the Examiner asserts that LO et al. teaches a controller which generates an Internet-frame based on the data received from the transmitting apparatus and based on an IP address which is assigned to a receiving apparatus. The Examiner also contends that "LO taught the destination address could be in MAC format (not IP address) identifying a node and be translated to IP format. One of ordinary skill in the art would recognize that a MAC address or a destination address such as a physical address (physical address or node ID taught by AKATSU) is not equivalent to an IP address. Although LO taught the data packet to include a destination address, the address could be in MAC address format and not necessary an IP address. Hence, LO's teachings reads on claim language where says, the data received from the transmitting apparatus not having IP address".

. However, in LO et al., a destination address is contained in data packet received from the first communication bus 240, as the Examiner admitted above. In LO et al., the destination address indicates “a node of the nodes 230-236 of the second communication which is *the ultimate receiver* of the data packet” (col. 8, lines 36-38).

On the other hand, in the present invention, the data, received from the transmitting apparatus not having an IP address, does not contain a destination address of the receiving apparatus. In this regard, Applicant has amended the pending claims to clarify this feature of the invention without narrowing the scope of the pending invention.

Thus, LO et al. does not disclose a controller which generates an Internet-frame based on the data received from the transmitting apparatus not having an IP address and based on an IP address which is assigned to a receiving apparatus, the data received from the transmitting apparatus not including a destination address of the receiving apparatus. The present invention is clearly distinguished over LO et al., since LO et al. contains the destination address in the received data payload section, as noted above.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 12-15, 22, 25, and 27 are not disclosed in LO et al. cited by the Examiner or by any proper combination of AKATSU et al. and LO et al.

Applicant notes that although the status of the present application is after final rejection, the present amendment is appropriate for entry in accordance with 37 C.F.R. § 1.116 as no new issues are raised thereby, and amendment clearly places the application into condition for allowance by eliminating the basis for the rejections.

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- Accordingly, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections and an indication of the allowability of all the claims pending in the present application in due course.

**SUMMARY AND CONCLUSION**

Applicant has made a sincere effort to place the present application in condition for allowance and believes that he has now done so. Applicant has amended several rejected claims, and has submitted the claims for reconsideration by the Examiner. With respect to the pending claims, Applicant has pointed out the features thereof and has contrasted the features of the new claims with the disclosures of the references. Accordingly, Applicant has provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully requests an indication of the allowability of all the claims pending in the present application in due course.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,  
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